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May 8, 2002

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

RE: Docket No. 01N-0458

Dear Food and Drug Administration:

The Avocado Commission is requesting a value of 5 grams of fat and 2 grams of fiber for the avocado. The avocado is the only fruit that contains fat, making the composition unique. The seasonal variation is significant due to the maturation of the fruit. As the season progresses moisture content decreases and fat content increases. This is reflected in the graphs. The FDA formula developed for type III foods are traditionally foods known to be a significant source of fat, such as salad dressings or packaged entrees. When applying the type III formula to a fruit, the outcome does not make sense nor does it apply to composite analysis. Through formulas, data can become significant, but examining the actual data points and the graphs I have provided, I recommend the label state five grams of fat and two grams of fiber.

Sincerely,

A handwritten signature in black ink, appearing to read "M. J. Renvall", with a stylized flourish at the end.

Marian J. Renvall, M.S., R.D.  
Senior Statistician  
University of California, San Diego